

EXHIBIT "A"

1. The factual and legal bases for SCK's claims and defenses in this case.
2. SCK's efforts to locate documents related to this case; which documents, if any, have been requested but not produced; and the reasons for non-production.
3. Whether and to what extent SCK received payment from any insurer for all or any part of the property for which EMC made payment.

Jackson 5088084v1